

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DONNA K. SOUTTER and TONY LEE WEBB,
*for themselves and on behalf of others similarly
situated individuals,*

Plaintiffs,

v.

EQUIFAX INFORMATION SERVICES, LLC,

Defendants.

Civil Action No. 3:10cv107-REP

**PLAINTIFFS' SUPPLEMENTAL MEMORANDUM IN OPPOSITION
TO DEFENDANT'S MOTION TO TRANSFER VENUE,
OR IN THE ALTERNATIVE TO SEVER**

COME NOW the Plaintiffs, Donna K. Soutter and Tony Lee Webb, by counsel, and in supplement to their previous Memorandum in Opposition to Defendant's Motion to Transfer Venue, they state:

After the date of Plaintiffs' filing of their Memorandum in Opposition, Plaintiffs and Defendant exchanged their respective Fed. R. Civ. P. 26(a)(1) disclosures identifying the witnesses they believe likely to have discoverable evidence to be used in support of the claims and defenses in the case. Besides the Plaintiffs themselves, no party – including Equifax – has identified a person in the Western District of Virginia. In fact,

the only non-party Virginia witness identified by Equifax is the Virginia Credit Union, an entity Plaintiff has already explained is located in Richmond.

The Parties' disclosures are attached hereto.

**DONNA K. SOUTTER and TONY LEE
WEBB, for themselves and on behalf of
others similarly situated individuals,**

/s/

Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION
ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

| | |
|---|--|
| John W. Montgomery, Jr., Esq. Montgomery & Simpson, LLP 2116 Dabney Road Suite A-1 Richmond, VA 23230 jmontgomery@jwm-law.com | Barry Goheen, Esq. King & Spalding 1180 Peachtree Street, NE Atlanta, GA 30309-3521 |
| John Anthony Love King & Spalding 1180 Peachtree Street, NE Atlanta, GA 30309-3521 tlove@kslaw.com | Keasha Ann Broussard, Esq. King & Spalding 1180 Peachtree Street, NE Atlanta, GA 30309-3521 abroussard@kslaw.com |

/s/

Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION
ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net